



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVEIN WILLIAM MAXIMILIAN
D'HABSBURG XVII,
aka "Sylvein D'Habsburg,"
aka "Sylvein Scalleone,"

Defendant.

CR No. 2:24-CR-00718-MWC

I N F O R M A T I O N

[18 U.S.C. § 1343: Wire Fraud; 18
U.S.C. § 981(a)(1)(C), 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The United States Attorney charges:

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant SYLVEIN WILLIAM MAXIMILIAN D'HABSBURG XVII, also known as ("aka") "Sylvein D'Habsburg," aka "Sylvein Scalleone," was a resident of Los Angeles, Glendale, and La Crescenta, in California.

2. Defendant D'HABSBURG owned, managed, and controlled the following business entities, all based in California: Wild Rabbit Technologies LLC ("Wild Rabbit") and BAI Intelligence LLC ("BAI Intelligence").

1 3. Defendant D'HABSBURG maintained access to and control over
2 a U.S. Bank account ending in 6835 held in the name of defendant
3 D'HABSBURG (the "6835 Account").

4 4. Wild Rabbit and BAI Intelligence were companies that
5 marketed an alleged artificial intelligence ("AI") technology that
6 could detect a COVID-19 infection based solely on a video recording
7 and predict future events, among other things.

8 5. Victim 1 had a bank account at Bank of the West.

9 B. THE SCHEME TO DEFRAUD

10 6. Beginning on a date unknown, but no later than January 16,
11 2018, and continuing through at least June 26, 2023, in Los Angeles
12 County, within the Central District of California, and elsewhere,
13 defendant D'HABSBURG, together with others known and unknown to the
14 United States Attorney, knowingly and with intent to defraud,
15 devised, participated in, and executed a scheme to defraud material
16 matters, and to obtain money and property from victims by means of
17 materially false and fraudulent pretenses, representations, and
18 promises, and the concealment of material facts.

19 7. The fraudulent scheme operated and was carried out, in
20 substance, as follows:

21 a. Defendant D'HABSBURG would hire recruiters to identify
22 potential investors for Wild Rabbit and BAI Intelligence in the local
23 Filipino community, including elderly church parishioners.

24 b. Defendant D'HABSBURG would invite the potential
25 investors to attend investment presentations at defendant
26 D'HABSBURG's office in Downtown Los Angeles, where defendant
27 D'HABSBURG would conduct demonstrations of his alleged AI technology,
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1 which he would claim could predict the future and detect a COVID-19
2 infection based solely on a video recording, among other things.

3 c. At these investment presentations, in order to induce
4 victim-investors to send him money, defendant D'HABSBURG would make
5 and cause to be made false representations and promises and would
6 maintain false pretenses, which defendant D'HABSBURG knew were false
7 at the time they were made, including the following:

8 i. That defendant D'HABSBURG had already secured
9 approximately \$500 million in investments for Wild Rabbit and BAI
10 Intelligence, including from the Harvard University endowment, Kobe
11 Bryant, Michael Jordan, Joel Osteen, Steve Wozniak, and others. In
12 fact, as defendant D'HABSBURG then knew, none of those individuals or
13 entities had invested in Wild Rabbit or BAI Intelligence.

14 ii. That U.S. Secretaries of State Mike Pompeo and
15 Hillary Clinton had consulted with defendant D'HABSBURG about his AI
16 technology. In fact, as defendant D'HABSBURG then knew, neither Mike
17 Pompeo nor Hillary Clinton had consulted with defendant D'HABSBURG
18 about his purported AI technology or companies.

19 iii. That defendant D'HABSBURG would use investment
20 funds to further research into his AI technology by hiring personnel
21 and obtaining patents.

22 d. Contrary to defendant D'HABSBURG's representations
23 about how he would use investor funds, which defendant D'HABSBURG
24 knew were false at the time they were made, defendant D'HABSBURG
25 would use investor funds for personal use, including spending
26 hundreds of thousands of dollars on luxury cars, rare antiques,
27 carved wooden throne chairs, high-end clothing, and cash withdrawals.

1 e. As a result of the scheme to defraud, defendant
2 D'HABSBURG caused investors a total of approximately \$5.947 million
3 in losses.

4 C. USE OF AN INTERSTATE WIRE

5 8. On or about April 15, 2020, in Los Angeles County, within
6 the Central District of California, for the purpose of executing the
7 above-described scheme to defraud, namely, the misuse and
8 misappropriation of investor funds fraudulently obtained in the name
9 of BAI Intelligence, defendant D'HABSBURG caused Victim 1 to
10 transmit, by means of wire communications in interstate commerce,
11 approximately \$224,378.43 to the 6835 Account held in the name of
12 defendant D'HABSBURG.

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in this single-count Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court;

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1 (d) has been substantially diminished in value; or (e) has been
2 commingled with other property that cannot be divided without
3 difficulty.

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